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*Attorney for Jerome Michael Bell*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
JEROME MICHAEL BELL,  
  
Defendant.

Case No. 2:15-cr-00011-JCM-CWH

**Stipulation and Order to Extend  
Deadline to File Reply to Government's  
Response in Opposition to Defendant's  
Motion for Compassionate Release [ECF  
244] (First Request)**

IT IS HEREBY STIPULATED AND AGREED, by Jacqueline Tirinnanzi, counsel for Jerome Michael Bell, and Jim Fang, counsel for the United States of America, that the October 22, 2024 deadline (ECF No. 265) on which defendant must file his Reply to Government's Response in Opposition to Defendant's Motion for Compassionate Release be extended 14 days from the day of this filing, to on or before November 5, 2024.

This stipulation is entered into based upon the following reasons:

1. Counsel for Defendant was appointed to Mr. Bell to supplement his motion for compassionate release on December 28, 2023. (ECF No. 250).
2. According to Amended General Order 2020-06 In Re: Compassionate Release Requests Under the First Step Act, the FPD must file a supplement to the defendant's pro se motion within thirty days.

- 1           3. At the time of Ms. Tirinnanzi's appointment to supplement Mr. Bell's motion, he  
2           was in custody on a writ at the Clark County Detention Center ("CCDC"). On  
3           February 2, 2024, when defense counsel was approved for communication and  
4           visitation with Mr. Bell at CCDC, she was made aware that Mr. Bell was no longer  
5           at the facility.
- 6           4. Due to Mr. Bell's transport from CCDC back to Beaumont USP, communication  
7           with Mr. Bell and defense counsel was delayed until February 23, 2024.
- 8           5. Initially Mr. Bell was unresponsive to follow up written attorney-client  
9           communication. An additional attempt was made, and according to USPS tracking  
10          services, on April 12, 2024, Beaumont USP rejected attorney mail sent to Mr. Bell.  
11          It is necessary for Mr. Bell to receive the mail for purposes of moving forward with  
12          his supplement to motion for compassionate release.
- 13          6. Defense counsel received a second call with Mr. Bell on May 13, 2024  
14          (communication is challenging due to frequent lockdowns). Counsel was made  
15          aware that Mr. Bell did not receive his attorney mail and therefore Mr. Bell has not  
16          filled out documentation necessary for defense counsel to move forward with  
17          supplementation of his motion for compassionate release.
- 18          7. Counsel for Mr. Bell has made attempts to schedule follow-up phone calls with Mr.  
19          Bell. His Counselor, Bijou is out of office until August 17, 2024. Counsel is reliant  
20          on Counselor Bijou to facilitate telephonic communications with Mr. Bell.
- 21          8. Upon Counselor Bijou's return, a call with Mr. Bell was scheduled for August 30,  
22          2024; however the call was cancelled. Counselor Bijou is on travel the week of  
23          September 1, 2024, and will return the week of September 8, 2024, which permitted  
24          the facilitation of a phone call with the client.
- 25          9. On September 29, 2024, Counsel for Mr. Bell filed the Supplement to the Motion for  
26          Compassionate Release (ECF No. 264) and on October 15, 2024, the Government  
27          28

1 filed their Response in Opposition to Defendant's Motion for Compassionate  
2 Release. (ECF No 265).

3 10. Due to Counsel's need for telephonic communication with Mr. Bell prior to filing  
4 the Reply and additional competing case commitments, additional time is needed  
5 before Counsel may file the Reply in Support of Defendant's Compassionate  
6 Release Motion.

7 11. The parties agree to the extension of time for 14 days.

8 12. This is the first request for extension of time.  
9

10  
11 Dated this 22nd day of October 2024.  
12

13 Respectfully Submitted,  
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15 /s/ Jim Fang  
16 JIM FANG, ESQ.  
17 Assistant United States Attorney

/s/ Jacqueline Tirinnanzi  
JACQUELINE TIRINNANZI, ESQ.  
Counsel for Jerome Michael Bell

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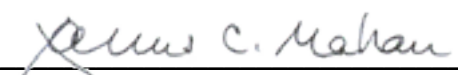
UNITED STATES OF AMERICA,  
  
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vs.  
  
JEROME MICHAEL BELL,  
  
Defendant.

Case No. 2:15-cr-00011-JCM-CWH

**Order**

Based upon the stipulation of counsel, and good cause appearing, IT IS HEREBY ORDERED that defendant's Reply to the Government's Response in Opposition to Defendant's Motion for Compassionate Release shall be due on or before November 5, 2024.

DATED: October 23, 2024

  
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THE HONORABLE JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE